

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ABC Corporation I et al,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A",

Defendants.

CASE NO. 1:20-cv-04806

Judge: Honorable Thomas M. Durkin

DECLARATION OF XIE RONGQING

I, Xie Rongqing, declare as follows:

1. I am over eighteen (18) years of age. I make this affidavit based on my own personal knowledge.
2. I am the owner of the company Dongguan Saibotan Nengyuan Keji (Energy Tech) Co. Ltd. ("Dongguan Saibotan"). Dongguan Saibotan owns and operates the Amazon storefront Gyroor-US.
3. Due to a preliminary injunction order issued against Gyroor-US on or about November 24, 2020, Gyroor-US' Amazon account has been frozen, and more than \$1 million USD has been restrained in Gyroor-US' account.
4. Since the preliminary injunction order was entered, Dongguan Saibotan's entire businesses have been suspended for more than 18 months, and Dongguan Saibotan has lost its abilities to generate any revenues and/or profits through its businesses.

5. In the last 18 months, because of the cash flow restraint caused by the preliminary injunction order, Dongguan Saibotan had to lay off all of its employees and borrowed money from banks, friends, and families to pay off its debts.
6. Dongguan Saibotan's business reputation has been ruined, and its Amazon store ranking and market share have dropped significantly.
7. On or about March 11, 2022, Dongguan Saibotan officially declared and filed for its bankruptcy in China.
8. Before the preliminary injunction order was entered, the average monthly net sales of Gyroor-US are approximately USD \$581,752.18.
9. Gyroor-US' gross profit margin is approximately 38% to 42% of its net sales. The gross profit margin is based on the company's net sales minus the costs of products sold.
10. Gyroor-US' net profit margin is approximately 6% to 8% of its net sales. The gross profit margin is based on the company's net sales minus the costs of products sold and all the other company costs and expenses.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 7/11/2022

By: Lie Rongqing